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MASS. DEPT. OF  
TELECOMMUNICATIONS & CABLE

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September 23, 2014

BY HAND

Catrice C. Williams, Secretary  
Dept. of Telecommunications and Cable  
1000 Washington Street, 8th Fl., Suite 820  
Boston MA 02118-6500

Re: Comcast of Massachusetts III, Inc. v. Peabody Municipal Light  
Plant and Peabody Municipal Lighting Commission, 14-2

Dear Ms. Williams:

Enclosed please find for filing Comcast's Second Set of Information Requests to  
Peabody Municipal Light Plant and Peabody Municipal Lighting Commission.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin Conroy".

Kevin Conroy

Enclosure

cc: 14-2 Service List



**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Comcast of Massachusetts III, Inc.

*Complainant,*

v.

D.T.C. 14-2

Peabody Municipal Light Plant and Peabody  
Municipal Lighting Commission

*Respondents.*

**COMCAST'S SECOND SET OF INFORMATION REQUESTS TO PEABODY  
MUNICIPAL LIGHT PLANT AND PEABODY MUNICIPAL LIGHTING  
COMMISSION**

Pursuant to 220 CMR §§ 1.06 and 45.06(1), Comcast of Massachusetts III, Inc. ("Comcast") hereby submits its Second Set of Information Requests to Peabody Municipal Light Plant and Peabody Municipal Lighting Commission (collectively, "PMLP"). In responding to these data requests, the Definitions and Instructions provided in Comcast's First Set of Information Requests to PMLP shall apply.

**INFORMATION REQUESTS**

- CST II-1. Refer to PMLP's Response to the Department of Public Utilities First Set of Information Requests, No. DPU-PMLP-1-1, including the Excel spreadsheet PMLP attached thereto detailing PMLP's pole attachment rate utilizing the Massachusetts Formula. Please identify the basis for the entry in Line E of that spreadsheet showing \$139,954.60 with the annotation "5% estimated appurtenance factor." Please provide all documents that support the amount shown and estimated, and explain in detail why the presumptive 15% appurtenance factor in the Massachusetts Formula was not used. If any of the amounts or estimates used in response to this Request are documented in or otherwise part of Account 364 or a subaccount thereto, please include all such documentation.
- CST II-2. Refer to PMLP's Response to the Department of Public Utilities First Set of Information Requests, No. DPU-PMLP-1-1, specifically the Excel spreadsheet

PMLP attached thereto detailing PMLP's pole attachment rate utilizing the Massachusetts Formula. Please identify the basis for the entry in Line U of that spreadsheet showing \$1,542,950 and explain why the amount recorded in PMLP's 2012 Annual Report to the DPU for Account 593 at p. 41 line 18b was not used. Please indicate what amounts, accounts, or line entries in PMLP's 2012 Annual Report, if any, were used to establish the amount used in Line U of the spreadsheet including the legal or other basis for using any amounts or figures other than what was recorded on PMLP's Annual Report for Account 593. Please provide any calculations and all backup documentation that PMLP relied on in estimating the amount used in Line U.

CST II-3. Refer to PMLP's 2013 Annual Report to the DPU for Account 593 at p. 41 line 18b. Please confirm that this entry is accurate. If PMLP believes the entry is not accurate please explain the basis for this belief and provide any calculations and backup documentation that PMLP relies on in support of such revised amount.

CST II-4. Refer to PMLP's Response to Comcast's First Set of Information Requests, No. CST I-1 and I-2, including the Excel pole spreadsheet PMLP attached thereto.

(A) Please explain the abbreviations entered in Columns G (Class), H (Type), I (Attachments), K (Anchor #1) and L (Anchor #2).

(B) Please confirm that the pole spreadsheet reflects PMLP records for all PMLP poles and identifies all PMLP poles to which Comcast is attached.

(C) Please confirm that the pole spreadsheet denotes Comcast attachments to PMLP poles by entries in Column I of "AL", "C", or "TC."

(D) Please confirm that the pole spreadsheet shows that Comcast is attached to 242 poles solely owned by PMLP and 7657 poles jointly owned by PMLP. If PMLP cannot confirm either of these numbers, please provide the number of poles to which Comcast is attached and the basis and manner of calculating such and explain in detail why the numbers (242 and 7657) are not correct.

Respectfully submitted,



Kevin C. Conroy (BBO #644894)

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*Attorneys for Comcast of Massachusetts III, Inc.*

Dated: September 23, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that on September 23, 2014, I served the foregoing document by personal delivery and first-class U.S. Mail to the attached Service List in accordance with the requirements of 220 CMR 1.05.

  
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Kevin Conroy